UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ROCHE FREEDMAN LLP,

Plaintiff,

Case No. 1:21-cv-01746 (JGK)(SN)

v.

JASON CYRULNIK,

Defendant.

JASON CYRULNIK,

Counterclaim-Plaintiff,

v.

ROCHE FREEDMAN LLP, KYLE ROCHE, DEVIN FREEDMAN, AMOS FRIEDLAND, NATHAN HOLCOMB, and EDWARD NORMAND,

Counterclaim-Defendants.

JASON CYRULNIK,

Third-Party Plaintiff,

v.

KYLE ROCHE, DEVIN FREEDMAN, AMOS FRIEDLAND, NATHAN HOLCOMB, and EDWARD NORMAND, Third-Party Defendants.

DECLARATION OF SEAN HECKER IN SUPPORT OF NOTICE OF WITHDRAWAL OF APPEARANCE

- I, Sean Hecker, declare and state as follows:
- 1. On February 27, 2021, I filed the complaint in this action and appeared on behalf of Plaintiff Roche Freedman LLP (ECF No. 1).

- 2. On April 26, 2022, I filed a Notice of Appearance on behalf of Counterclaim-Defendants and Third-Party Defendants Devin Freedman, Amos Friedland, Nathan Holcomb, Edward Normand, and Kyle Roche (ECF. No. 100).
- 3. On September 13, 2022, I filed a Motion to Withdraw as Attorney for Counterclaim-Defendant and Third-Party Defendant Kyle Roche (ECF No. 237).
- 4. On November 8, 2022, the Court approved the substitution of Jonathan P. Bach of Shapiro Arato Bach in place and stead of Kaplan Hecker & Fink LLP as counsel for Plaintiff and Counterclaim-Defendant Roche Freedman LLP and Counterclaim-Defendants and Third-Party Defendants Devin Freedman, Amos Friedland, and Edward Normand (ECF. No. 275).
- 5. Pursuant to Local Civil Rule 1.4, I respectfully request that the Court withdraw my individual appearance as counsel for Counterclaim-Defendant and Third-Party Defendant Nathan Holcomb.
- 6. This withdrawal is made with the consent of Nathan Holcomb, an attorney admitted to practice in this court.
- 7. This withdrawal will not affect this action in any way, including the posture of the case and the calendar; nor will it prejudice Defendant and Counterclaim-Plaintiff and Third-Party Plaintiff. I am not asserting a retaining or charging lien.

Dated: November 17, 2022 New York, New York Respectfully submitted,

/s/ Sean Hecker Sean Hecker KAPLAN HECKER & FINK LLP 350 Fifth Avenue, 63rd Floor New York, New York 10118 Telephone: (212) 763-0883 Facsimile: (212) 564-0883

Counsel for Plaintiff

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